

**COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Southwest Regional Office**

STATEMENT OF LEGAL AND FACTUAL BASIS

Consolidated Glass & Mirror Corporation
110 Jack Guynn Drive - Galax, Virginia
Permit No. SWRO11085

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Consolidated Glass & Mirror Corporation has applied for a Title V Operating Permit for its Plant No. 2 facility located at 110 Jack Guynn Drive in Galax, Virginia. The Department has reviewed the application and has prepared a proposed Title V Operating Permit.

Engineer/Permit Contact: _____ Date: _____

Air Permit Manager: _____ Date: _____

Deputy Regional Director: _____ Date: _____

FACILITY INFORMATION

Permittee
Consolidated Glass & Mirror Corporation
Plant No. 2
110 Jack Guynn Drive
Galax, VA 24333
NET Facility No. 51-640-00067

SOURCE DESCRIPTION

SIC Code: 3231 – Glass Products, Made of Purchased Glass

Consolidated Glass & Mirror Corporation (CG&M) manufactures mirrors at their Plant No. 2 facility located at 110 Jack Guynn Drive, in Galax, Virginia. Large sheets of glass are loaded onto the silver line where they are transformed into mirrors on a continuous conveyor line. The glass sheets are cleaned by automated rotating brushes and tap water. The surface of the glass is lightly etched with cerium oxide and rinsed with deionized water. The cerium oxide roughens the surface of the glass and improves chemical adhesion. A tin sensitizer solution is applied just prior to the silver solution to chemically bond the reflective silver to the glass. A copper solution is then applied to improve the adhesion of the mirror backing paint (applied in a later step) to the reflective coating surface. The mirrors are again rinsed with deionized water and then heated in an electric oven. The mirrors then pass through a continuously flowing curtain of paint at the curtain coater. This backing paint is applied over the reflective metals to protect them from environmental conditions (moisture). The viscosity of the backing paint is constantly monitored and additional solvent is added as needed. The mirror backing paint application process is responsible for the majority of the VOC emissions from the facility.

After exiting the curtain coater, the mirrors are dried in a series of infrared ovens that enclose a section of the conveyor line. The mirrors are allowed to cool slightly before entering the rotogravure, which applies an ultra-violet (UV) coating over the backing paint to protect and improve its durability. UV light is used to cure the UV coating. The mirrors are then unloaded from the conveyor line and inspected for flaws. The mirrors may then be sent directly to shipping or to any of the various cutting, grinding, beveling, and/or framing operations at the facility.

The facility is a Title V major source of VOC, xylene, ethyl benzene, and total hazardous air pollutant (HAP) emissions. This source is located in an attainment area for all criteria pollutants. The facility is currently permitted under a minor NSR Permit issued on October 23, 2001 (as amended November 29, 2001).

The list of insignificant activities in the Title V application includes several processes that have no emissions associated with them. These operations include: plant wastewater pH control, which utilizes sulfuric acid and caustic soda; ammonia scrubber cleaning with acetic acid; various wet glass cutting and polishing operations (slitters, seam belts, radius corners, drilling, pattern V-groove, master edge, hand cutting, pattern beveling, pattern polisher, hand edging, and felt wheel); glass cleaning and etching with cerium oxide; glass/mirror cutting head coolant pH adjustment with boric acid; wastewater treatment; product packaging (cartoning); and shipping.

COMPLIANCE STATUS

The facility is inspected at least once each year and the last formal inspection was conducted on October 5, 2001. The source was found to be in compliance with all applicable requirements.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Space Heaters & Water Heaters - There are forty-nine (49) space heaters (6,129,000 Btu/hr combined), five (5) propane-fired water heaters (3,070,000 Btu/hr combined) and one (1) 1,060,000 Btu/hr propane-fired boiler at the facility. These units were included in the NSR permit to better quantify the facility-wide VOC emissions limits. The corresponding emissions limits in the permit are based on 8760 hours/year operation. There are no add-on control devices installed on any of the propane-fired units.

Tin Sensitizer Sprays – A tin sensitizer solution is applied to the glass immediately prior to the reflective silver to chemically bond the silver to the glass. Consumption of the sensitizer solution (which contains hydrochloric acid) is limited to 0.96 lbs/hr and 5398 lbs/yr. These consumption limits restrict the potential hydrochloric acid emissions to levels below the Virginia toxic pollutant exemption rates for HCl.

Curtain Coater - The mirrors pass through a continuously flowing curtain of paint, which is applied over the reflective silver surface of the mirror. Thinners are added to the paint to maintain its viscosity at the desired level. VOC is emitted from exhausts in the curtain coater room, between the curtain coater and the infrared drying ovens, and inside the infrared drying ovens. Annual VOC emissions from the paint and thinner are limited to 222.57 tons. There are no add-on VOC control devices on the curtain coater or silver line.

Rotogravure - Applies a UV paint over the mirror backing paint. VOC emissions from the rotogravure paint application are limited to 8.03 tons/year, based on a consumption limit of 73.0 tons/yr of 11% VOC UV paint. The facility normally uses a UV paint with less than 0.1% VOC and resulting annual emissions are less than 0.1 T/yr. There are no VOC control devices on the rotogravure exhaust.

Glass Cutting (Bystronics) - Mineral spirits is sometimes used as a lubricant in the glass cutting operations. For permitting purposes, 100% of the lubricant may potentially be released into the atmosphere as VOC. VOC emissions from glass cutting operations are limited to 10.0 tons/year. There is no exhaust or control device on the glass cutting operations.

Glass Grinding & Beveling – CG&M may use glass grinding coolants that contain up to 10% VOC by weight. A batch of coolant solution is typically comprised of 40,000 gallons of water and 400 gallons of coolant. The coolant solution is pumped to the grinding and beveling machines and circulated back to the storage tank 24 hours/day, 5 days/week. After the coolant solution has been in use for a period of 4 weeks, it is replaced with a new batch. Annual VOC emissions are limited to 8.0 tons/year.

EMISSIONS INVENTORY

The 1996 annual emissions are summarized in the following table:

Emission Unit	1996 Criteria Pollutant Emissions (Tons/Year)				
	VOC	CO	SO ₂	PM ₁₀	NO _x
Curtain Coater	125.37				
Space Heaters	0.04	0.15	0.01	0.15	0.59

Glass Cutting	2.00				
Total	127.41	0.15	0.01	0.15	0.59

EMISSION UNIT APPLICABLE REQUIREMENTS

Space Heaters & Water Heaters (Unit ID No. 3):

Limitations:

The following VOC limitations are State BACT requirements from Conditions 3 and 14 of the Minor NSR Permit issued on October 23, 2001 (as amended November 29, 2001):

- ! Condition 3, limiting the approved combustion fuel to propane.
- ! Condition 14 limiting PM and PM-10 emissions to 0.14 pounds per hour and 0.60 tons per year; SO₂ emissions to 0.18 pounds per hour and 0.80 tons per year; NO_x emissions to 1.08 pounds per hour and 4.73 tons per year; CO emissions to 0.27 pounds per hour and 1.20 tons per year; and, VOC emissions to 0.05 pounds per hour and 0.24 tons per year.

9 VAC 5 Chapter 50, Part II, Article 1, *Standards of Performance for Visible Emissions and Fugitive Dust/Emissions* are applicable to each source of visible emissions and each source of fugitive dust/emissions. Since the fuel burning equipment may exhibit visible emissions, the specific opacity limits of 9 VAC 5-50-80 apply:

- ! Visible emissions shall not exceed 20% opacity, except for one six-minute period in any hour of not more than 30% opacity.

However, since the propane-fired equipment would never be expected to exceed 20% opacity during normal operations, the 20/30% opacity limit listed in the *Facility-Wide Limitations* section will be sufficient.

Monitoring & Recordkeeping:

As required in Condition 15 of the Minor NSR Permit issued on October 23, 2001 (as amended November 29, 2001), CG&M will monitor and record on a monthly basis, the combined annual consumption of propane in the space heaters, water heaters, and boiler. The exclusive use of propane in the fuel-burning equipment will be used to show compliance with the 20%/30% opacity limits.

The following emission factors will be used to show compliance with the emission limits listed in Condition 14 of NSR permit issued on October 23, 2001 (as amended November 29, 2001):

Regulated Pollutant	Emission Factors (lbs/1000 gal propane)		Limitation / Standard	
	Space Heaters	Boiler	lb/hr	tons/yr
PM	1.85	0.26	0.14	0.60
PM-10	1.85	0.26	0.14	0.60
SO ₂	1.60	1.60	0.18	0.80
NO _x	7.50	12.40	1.08	4.73
CO	1.95	3.10	0.27	1.20

Regulated Pollutant	Emission Factors (lbs/1000 gal propane)		Limitation / Standard	
	Space Heaters	Boiler	lb/hr	tons/yr
VOC	0.50	0.47	0.05	0.24

Emission limits are based on 8760 hr/yr operation. Space heater emission factors obtained from AIRS SCC 10500110. Boiler emission factors obtained from AIRS SCC 10201002 and 10301002.

Testing:

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting:

Condition 18 of the Minor NSR Permit issued on October 23, 2001 (as amended November 29, 2001) requires that CG&M notify DEQ within four (4) hours of any malfunction that results in excess emissions for more than one (1) hour. Within 14 days, CG&M shall provide a written statement explaining the problem, the corrective action taken, and estimated duration of the malfunction.

Streamlined Requirements:

There are no streamlined requirements for the propane-fired space heaters, water heaters, and boiler.

Tin Sensitizer Spray Process (Unit ID No. 1.A)

Limitations:

The following limitation is a State BACT requirement from Condition 26 of the Minor NSR Permit issued on October 23, 2001 (as amended November 29, 2001):

- Condition 26, limiting tin halide sensitizer solution consumption to 0.96 pounds per hour and 5398 pounds per year.

Monitoring & Recordkeeping:

As required in Condition 32 of the Minor NSR Permit issued on October 23, 2001 (as amended November 29, 2001), CG&M will maintain records of the monthly and annual consumption of tin halide sensitizer solution. Annual consumption will be calculated as the sum of each consecutive twelve (12) month period.

Testing:

There are no emission limits on the tin sensitizer spray process (Unit ID No. 1.A) and thus emissions testing is not necessary.

Streamlined Requirements:

There are no streamlined requirements for the tin sensitizer spray operations.

Curtain Coater (Unit ID No. 1.B)

Limitations:

The following limitations are State BACT requirements from Conditions 4, 5, and 10 of the Minor

NSR Permit issued on October 23, 2001 (as amended November 29, 2001):

- Condition 4, limiting consumption of reducer in the curtain coater mirror back painting operation to 24.0 pounds per hour and 18.3 tons per year.
- Condition 5, limiting curtain coater mirror back paint consumption to 177.9 pounds per hour and 391.0 tons per year. The maximum VOC content in the approved paints is 44.57% by weight.
- Condition 10 limiting annual VOC emissions to 103.29 pounds per hour and 222.57 tons per year.

Monitoring & Recordkeeping:

As required in Condition 15 of the Minor NSR Permit issued on October 23, 2001 (as amended November 29, 2001), CG&M will monitor and record on a monthly basis, the weight of mirror backing paint and reducer consumed and the VOC throughput. Hourly, monthly and annual VOC emissions will be calculated and recorded. Hourly VOC emissions will be calculated by dividing monthly emissions by monthly hours of operation.

Testing:

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit, if necessary to determine compliance with an emission limit or standard.

Reporting:

Condition 18 of the Minor NSR Permit issued on October 23, 2001 (as amended November 29, 2001) requires that CG&M notify DEQ within four (4) hours of any malfunction that results in excess emissions for more than one (1) hour. Within 14 days, CG&M shall provide a written statement explaining the problem, the corrective action taken, and estimated duration of the malfunction.

Compliance with the curtain coater VOC emission limits listed in Condition 10 of the NSR permit issued October 23, 2001 (as amended November 29, 2001), will be demonstrated through emission calculations. These emission calculations will be based on 100% of the VOC in the mirror backing paint (as applied) being emitted to the atmosphere. The VOC content of each paint and reducer (per the product MSDS) multiplied by the corresponding quantity of each coating applied will be used to determine the monthly VOC emissions from the curtain coater. Hourly emissions will be determined by dividing the monthly VOC total by the hours of curtain coater operation.

Streamlined Requirements:

There are no streamlined requirements for the curtain coater mirror back painting operation.

Rotogravure UV Coating Process (Unit ID No. 1.C)

Limitations:

The following limitations are State BACT requirements from Conditions 6 and 11 of the Minor NSR Permit issued on October 23, 2001 (as amended November 29, 2001):

- Condition 6, limiting rotogravure coating consumption to 25 pounds per hour and 73 tons per year. The VOC content of equivalent rotogravure coatings is not to exceed 11% by weight.
- Condition 11 limiting annual VOC emissions from the rotogravure coating process to 2.75 pounds per hour and 8.03 tons per year.

Monitoring & Recordkeeping:

As required in Condition 15 of the Minor NSR Permit issued on October 23, 2001 (as amended November 29, 2001), CG&M will monitor and record on a monthly basis, the weight of coatings consumed in the rotogravure and the VOC throughput. Hourly, monthly and annual VOC emissions will be calculated and recorded. Hourly VOC emissions will be calculated by dividing monthly emissions by monthly hours of operation.

Testing:

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit, if necessary to determine compliance with an emission limit or standard.

Reporting:

Condition 18 of the Minor NSR Permit issued on October 23, 2001 (as amended November 29, 2001) requires that CG&M notify DEQ within four (4) hours of any malfunction that results in excess emissions for more than one (1) hour. Within 14 days, CG&M shall provide a written statement explaining the problem, the corrective action taken, and estimated duration of the malfunction.

Compliance with the rotogravure UV coating process VOC emission limits listed in Condition 11 of the NSR permit issued October 23, 2001 (as amended November 29, 2001), will be demonstrated through emission calculations. These emission calculations will be based on 100% of the VOC in the UV coating being emitted to the atmosphere. The VOC content of each coating (per the product MSDS) multiplied by the corresponding quantity of that coating applied will be used to determine the monthly VOC emissions from the rotogravure. Hourly emissions will be determined by dividing the monthly VOC total by the hours of rotogravure operation.

Streamlined Requirements:

There are no streamlined requirements for the rotogravure UV coating application operation.

Glass Cutting Operations (Unit ID No. 2)

Limitations:

The following limitations are State BACT requirements from Conditions 7 and 12 of the Minor NSR Permit issued on October 23, 2001 (as amended November 29, 2001):

- Condition 7, limiting mineral spirits (or equivalent volatile lubricant) consumption to 65.0 pounds per hour and 10.0 tons per year.
- Condition 12 limiting annual VOC emissions from the glass cutting operations to 65.00 pounds per hour and 10.00 tons per year.

Monitoring & Recordkeeping:

As required in Condition 15 of the Minor NSR Permit issued on October 23, 2001 (as amended November 29, 2001), CG&M will monitor and record on a monthly basis, the consumption of glass cutting lubricant. Hourly consumption will be calculated by dividing monthly consumption by monthly hours of operation.

Testing:

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit, if necessary to determine compliance with an emission limit or standard.

Reporting:

Condition 18 of the Minor NSR Permit issued on October 23, 2001 (as amended November 29, 2001) requires that CG&M notify DEQ within four (4) hours of any malfunction that results in excess emissions for more than one (1) hour. Within 14 days, CG&M shall provide a written statement explaining the problem, the corrective action taken, and estimated duration of the malfunction.

Compliance with the glass cutting lubricant VOC emission limits listed in Condition 12 of the NSR permit issued October 23, 2001 (as amended November 29, 2001), will be demonstrated through emission calculations. These emission calculations will be based on 100% of the VOC in the lubricant (mineral spirits or equivalent) being emitted to the atmosphere. The VOC content of each lubricant (per the product MSDS) multiplied by the corresponding quantity of that lubricant consumed will be used to determine the monthly VOC emissions from glass cutting. Hourly emissions will be determined by dividing the monthly VOC total by the hours of unit operation.

Streamlined Requirements:

There are no streamlined requirements for the glass cutting operations.

Glass Grinding & Beveling Coolant (Unit ID No. 4)

Limitations:

The following limitations are State BACT requirements from Conditions 8 and 13 of the Minor NSR Permit issued on October 23, 2001 (as amended November 29, 2001):

- Condition 8, limiting Quaker Microcut 106-C (or equivalent coolant) consumption to 13.9 pounds per hour and 80.0 tons per year.
- Condition 13 limiting annual VOC emissions from the glass cutting operations to 1.39 pounds per hour and 8.00 tons per year.

Monitoring & Recordkeeping:

As required in Condition 15 of the Minor NSR Permit issued on October 23, 2001 (as amended November 29, 2001), CG&M will monitor and record on a monthly basis, the consumption of glass grinding coolant. Hourly consumption will be calculated by dividing monthly consumption by monthly hours of operation.

Testing:

The permit does not require source tests. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit, if necessary to determine compliance with an emission limit or standard.

Reporting:

Condition 18 of the Minor NSR Permit issued on October 23, 2001 (as amended November 29, 2001) requires that CG&M notify DEQ within four (4) hours of any malfunction that results in excess emissions for more than one (1) hour. Within 14 days, CG&M shall provide a written statement explaining the problem, the corrective action taken, and estimated duration of the malfunction.

Compliance with the glass grinding coolant VOC emission limits listed in Condition 13 of the NSR permit issued October 23, 2001 (as amended November 29, 2001), will be demonstrated through emission calculations. These emission calculations will be based on 100% of the VOC in the coolant being emitted to the atmosphere. The VOC content of each lubricant (per the product MSDS) multiplied by the corresponding quantity of that lubricant consumed will be used to determine the monthly VOC emissions from the glass grinding coolant. Hourly emissions will be determined by dividing the monthly VOC total by the hours of unit operation.

Streamlined Requirements:

There are no streamlined requirements for the glass cutting operations.

FACILITY-WIDE REQUIREMENTS

Limitations:

The following limitation is a State BACT requirement from Condition 9 of the Minor NSR Permit issued on October 23, 2001 (as amended November 29, 2001):

- Condition 9, limiting the annual production of mirrors to 52 million square feet.

Monitoring & Recordkeeping:

As required in Condition 15 of the Minor NSR Permit issued on October 23, 2001 (as amended November 29, 2001), CG&M will monitor and record on a monthly basis, the annual throughput of mirrors, calculated as the sum of each consecutive twelve (12) month period.

Testing:

The permit does not require facility-wide source testing. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit, if necessary to determine compliance with an emission limit or standard.

Reporting:

Condition 18 of the NSR permit dated October 23, 2001 (as amended November 29, 2001) requires that the permittee notify the DEQ Director within four business hours if the permitted facility or related air pollution control equipment causes excess emissions for more than one hour. The owner must provide a written statement within 14 days explaining the problem, corrective actions taken, and the estimated duration of the malfunction.

Streamlined Requirements:

There are no facility-wide streamlined requirements.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110, that apply to all federal operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions, including those caused by upsets, within one business day.

STATE-ONLY APPLICABLE REQUIREMENTS

The following Virginia Administrative Code have specific requirements only enforceable by the State and have not been included in the Federal Operating Permit:

- 9 VAC 5-40-340, Standard for odor;
- 9 VAC 5-50-180, Standard for Toxic Pollutants; and
- 9 VAC 5-40-350, Standard for Toxic Pollutants.

FUTURE APPLICABLE REQUIREMENTS

There are no known future applicable requirements for this facility.

INAPPLICABLE REQUIREMENTS

The provisions of 9 VAC 5-40-300 (Standard for Volatile Organic Compounds) and 9 VAC 5-40-310 (Standard for Nitrogen Oxides) are not appropriate since the facility is not located in the Northern Virginia Emissions Control Area.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting will be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
23	Floor Patch	9 VAC 5-80-720 A	none	-
24	Silver Nitrate Solution (mirror plating process)	9 VAC 5-80-720 B	none	-
25	Sodium Hydroxide Solution (mirror plating process)	9 VAC 5-80-720 B	none	-
26	UV Cleanup - MEK	9 VAC 5-80-720 B	MEK / VOC	
27	Sulfuric Acid (pH control in waste water treatment)	9 VAC 5-80-720 B	none	-
28	Muriatic Acid (regeneration of deionizers and cleaning filter cloths in filter press)	9 VAC 5-80-720 B	Hydrochloric Acid	-
29	Caustic Soda (Wastewater pH)	9 VAC 5-80-720 B	none	-
30	Acetic Acid (Ammonia Scrubber Cleaning)	9 VAC 5-80-720 B	none	-
31	Silver Nitrate Solution (Silver Line)	9 VAC 5-80-720 B	none	-
32	Mirror Slitters	9 VAC 5-80-720 B	none	-
33	Copper Sulfate Solution (Silver Line)	9 VAC 5-80-720 B	none	-
35	Seam Belt	9 VAC 5-80-720 B	none	-
36	Mirror & Glass Washing (Cleaner)	9 VAC 5-80-720 B	none	-
37	Vinyl Backing	9 VAC 5-80-720 B	none	-
46	Cartoning	9 VAC 5-80-720 B	none	-
47	Shipping	9 VAC 5-80-720 B	none	-
54	Receiving	9 VAC 5-80-720 B	none	-
55	Returns	9 VAC 5-80-720 B	none	-
56	Wood Shop (Shipping Crates)	9 VAC 5-80-720 B	none	-

Emission Unit No.	Emission Unit Description	Citation	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
39 40 41 42 43 48 49 52 53	<u>Drilling, Grinding, & Shaping:</u> - Radius Corner - Drilling - Pattern V-Groove - Master Edge - Hand Cutting - Pattern Beveling - Pattern Polisher - Hand Edging - Felt Wheel	9 VAC 5-80-720 B	none	-
57	Maintenance Shop & Routine Equipment Maintenance	9 VAC 5-80-720 A	none	-
58	Clean-Up	9 VAC 5-80-720 B	none	-
59	Boric Acid (Adjust Coolant Pit pH)	9 VAC 5-80-720 B	none	-
60	Defoamer (Coolant Pit and Wastewater Treatment)	9 VAC 5-80-720 B	VOC	-
61	Soap for Washers	9 VAC 5-80-720 B	none	-
62	Face-Down Stripper (Mirror Cleaning)	9 VAC 5-80-720 B	none	-
63	Nitric Acid (Silver Line Cleaning)	9 VAC 5-80-720 B	none	-
64	Hydraulic Oil	9 VAC 5-80-720 B	VOC	-
65	Parts Washer	9 VAC 5-80-720 B	VOC	-
66	Copper Sulfate Pentahydrate (Mirror Plating)	9 VAC 5-80-720 B	none	-
67	Sugar Solution (Mirror Plating)	9 VAC 5-80-720 B	none	-
68	Cerium Oxide (Glass Cleaning/Polishing/Etching)	9 VAC 5-80-720 B	none	-
69	UV Ink (Printing on Mirror Back)	9 VAC 5-80-720 B	VOC	-
70	Rubber Adhesive (Attach particle board mirror backing)	9 VAC 5-80-720 B	VOC	-
71	Rubber Adhesive (Attach particle board mirror backing)	9 VAC 5-80-720 B	VOC	-

The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

9 VAC 5-80-720 B - Insignificant due to emission levels

9 VAC 5-80-720 C - Insignificant due to size or production rate

Note that the insignificant emission units identified as not emitting any pollutants will not be included in the Title V permit since by definition, they are not emission units.

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are available for public review.

PUBLIC PARTICIPATION

A public notice appeared in The Roanoke Times on December 9, 2001 announcing a 30-day public comment period for this permit. The public comment period extended until January 8, 2002. Notice was also provided to North Carolina, Tennessee, and West Virginia as affected states.